## REMARKS

In the present Office Action, Claims 1-3, 7-10 and 14-17 and 21 are rejected under 35 U.S.C. § 103(a) as unpatentable over U.S. Patent No. 5,589,290 to *Maxwell et al.* (*Maxwell*) in view of U.S. Patent No. 6,044,382 to *Martino*. In addition, Claims 4, 11 and 18 are rejected under 35 U.S.C. § 103 as unpatentable over *Maxwell* and *Martino* in view of U.S. Patent No. 5,794,259 to *Kikinis*, and Claims 5 and 12 are rejected under 35 U.S.C. § 103 in view of *Maxwell* and *Martino* in view of U.S. Patent No. 6,587,822 to *Brown*. Claims 6, 13 and 20 are further rejected under 35 U.S.C. § 103 as unpatentable over *Maxwell* and *Martino* in view of Courtner, Mastering Windows Office 2000, Professional Edition, 04/1999 (*Courtner*), and Claim 19 is rejected under 35 U.S.C. § 103 as unpatentable in view of *Maxwell* and *Martino* in view of *Kikinis* and *Brown*. Those rejections are all respectfully traversed, and favorable reconsideration of the claims is respectfully requested.

Applicant respectfully submits that the present claims are not rendered unpatentable under 35 U.S.C. § 103 by the combination of *Maxwell* and *Martino* because that combination fails to teach or suggest each feature of the present claims. For example, with respect to exemplary Claim 1, the combination of cited references does not teach or suggest:

> prior to submission of the form with the data to a server system hosting the web page, the browser application automatically saving an address of the web page, the data provided from the user for the form, and at least one field identifier for associating the data to at least one respective field of the form, into a volatile memory system of the client system, wherein the address, the data and the at least one field identifier are still stored in the volatile memory system after the browser application is closed.

Page 2 of the present Office Action correctly notes that *Maxwell* fails to teach the above cited feature. Page 2 of the present Office Action then cites col. 20, lines 59-62 of *Martino* as teaching "as an entry is made in each field [of a form], it is automatically stored within the input buffer area of the transaction buffer 97 at its assigned location and in the dictated format." Page 3 of the present Office Action then cites col. 22, lines 8-14 of *Martino* as suggesting that the data is stored so that information is not lost due to a modem error.

Even assuming *arguendo* the Examiner's assessment of *Martino*, the combination of *Maxwell* and *Martino* does not teach each of the features recited in exemplary Claim 1. For example, the combination of cited references does not teach (and the Examiner does not allege that the combination of references teaches) persistent storage of the address of the web page such that "the address ... [is] still stored in the volatile memory system after the browser application is closed". At most, the Examiner alleges that the combination of *Maxwell* and *Martino* discloses the storage of form data. Absent disclosure of the storage of the address of the web page after the browser application is closed, the combination of *Maxwell* and *Martino* cannot render exemplary Claim 1 unpatentable. Applicant therefore respectfully submits that the rejections of exemplary Claim 1, similar Claims 8 and 15, and their respective dependent claims under 35 U.S.C. § 103 are overcome.

Applicant further respectfully submits that exemplary Claim 1 is not rendered unpatentable by the combination of *Maxwell* and *Martino* because that combination does not teach or suggest:

> ... the browser application automatically saving an address of the web page, the data provided from the user for the form, and at least one field identifier for associating the data to at least one respective field of the form, into a volatile memory system of the client system, wherein the address, the data and the at least one field identifier are still stored in the volatile memory system after the browser application is closed. (emphasis supplied)

With respect to this feature, the Examiner states that *Martino* "suggests that this data persists so that information is not lost due[] to a modem error and the like (Col. 22, lines 8-14)." However, the Examiner does not allege that the combination of references teaches or suggests (and the combination of references does not teach or suggest) that "the address, the data and the at least one field identifier are still stored in the volatile memory system after the browser application is closed," as required by exemplary Claim 1. Thus, the Examiner has not set forth a *prima facie* case of obviousness.

Moreover, *Martino* makes it clear that its "simple firmware algorithms" (col. 16, line 46) are the "sole code used to control microprocessor 94 ... (i.e., no conventional application programs ... need[] to be provided)"(*Martino*, col. 16, lines 58-59). Thus, *Martino* has no browser application to close, and thus cannot store a web page address, form data and at least one field identifier "after the

browser application is closed." Moreover, *Martino* suggests that transaction buffer 97, which is relied upon by the Examiner as teaching a persistent buffer, is a small RAM that "only needs to be as large as the largest data transaction" (col. 15, lines 62-64). This disclosure further suggests to those skilled in the art that transaction buffer 97 does not continue to buffer a transaction after successful transmission and certainly would not store a transaction after *Martino's* firmware algorithms are "closed".

Because the combination of *Maxwell* and *Martino* does not teach or suggest a browser application automatically and persistently storing form data in volatile memory in the manner recited in exemplary Claim 1, Applicant respectfully submits that the rejections of Claim 1, similar Claims 8 and 15 and their respective dependent claims under 35 U.S.C. § 103 are overcome.

Applicant further submits that Claims 2, 9 and 16 are not rendered unpatentable by the combination of *Maxwell* and *Martino* because that combination does not teach or suggest "detecting a match between the saved address and the address of the retrieved web page" and then automatically filling in the form on the web page "in response to detecting a match between the saved address and the address of the retrieved web page." At page 3 of the Office Action, the Examiner admits that *Maxwell* fails to teach the steps recited in exemplary Claim 2 and then cites *Martino* as disclosing batch transactions and the correction of previously entered data entries. Because the teachings of *Martino* cited by the Examiner are clearly <u>not</u> what is recited in exemplary Claim 2, the Examiner then seeks to extend *Martino's* disclosure by reasoning within the guise of a skilled artisan stating, "One could imagine ... ." (Office Action, page 3, last sentence). Applicant respectfully traverses the Examiner's position and respectfully points out that in relying upon his imagination rather than upon the reference teachings, the Examiner is engaging in impermissible hindsight reasoning.

When the disclosures of the cited references are objectively examined, it is clear that the combination of *Maxwell* and *Martino* does not teach or suggest <u>detecting an address match</u> as claimed and then automatically filling a form in response to detecting the match. Because the combination of *Maxwell* and *Martino* does not disclose detecting an address match as claimed, Applicant respectfully submits that the rejections of Claims 2, 9 and 16 are overcome.

Finally, at page 10 of the present Office Action, the Examiner comments on the breadth of the claims and opines that the claims read on a user saving a screen dump of a form to a clipboard. In response, Applicant respectfully traverses the Examiner's assertion because the claims clearly recite "the browser application automatically saving an address of the web page, the data provided from the user for the form, and at least one field identifier." The automatic operation of the browser application clearly does not read on the user-performed steps urged by the Examiner. Accordingly, Applicant has not narrowed the claims in the present response as suggested by the Examiner and respectfully requests a telephone conference with the Examiner if the Examiner harbors any lingering doubts as to the patentability of the present invention over the user-performed steps noted by the Examiner.

Having now addressed each objection and rejection set forth in the present Office Action, Applicant respectfully submits that all pending claims are in condition for allowance and respectfully requests such allowance.

No fee or extension of time is believed to be required; however, in the event any fee, including a fee for an extension of time, is required, please charge that fee to IBM Corporation Deposit Account No. **09-0447**.

Respectfully submitted,

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